

JOINTLY SUBMITTED

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

William Bridge, *on behalf of himself and all* :  
*others similarly situated,* :

Plaintiff,

vs.

Credit One Bank, N.A.,

Defendant.

Case No.: 2:14-cv-01512-LDG-NJK

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING MEET AND  
CONFER DEADLINE**

The parties to the above-captioned action respectfully jointly submit the following Stipulation and Proposed Order for the Court's consideration and approval:

WHEREAS, on June 26, 2015, the Court denied without prejudice both Defendant's motion for protective order and Plaintiff's motion to compel (previously filed with the Court) and ordered the parties "to meet and confer to discuss their discovery disputes in light of the denial of Defendant's motion to quash in the Eastern District of Pennsylvania" (Dkt. No. 93 at 4);

WHEREAS, on June 26, 2015, the Court further ordered that, "If they are unable to resolve the dispute in its entirety, the parties may bring renewed discovery motions no later than July 10, 2015," and provided a briefing schedule for any such motions (Dkt. No. 93 at 4);

WHEREAS, on July 1, 2015, counsel for the parties (Brian G. Anderson on behalf of Defendant and Kyle J. McGee on behalf of Plaintiff) met in person and discussed their respective positions on the discovery disputes raised in Defendant's motion for protective order and Plaintiff's motion to compel in light of the Eastern District of Pennsylvania's May 19, 2015 ruling and pursuant to the Court's order (Dkt. No. 93);

WHEREAS, on July 2, 2015, counsel for the parties (Brian G. Anderson and R. Calder Huntington on behalf of Defendant and Kyle J. McGee and Diane Zilka on behalf of Plaintiff) conferred telephonically and further discussed their respective positions on the discovery disputes

1 raised in Defendant's motion for protective order and Plaintiff's motion to compel in light of the  
 2 Eastern District of Pennsylvania's May 19, 2015 ruling and pursuant to the Court's order (Dkt. No.  
 3 93);

4 WHEREAS, the parties are continuing to meet and confer in good faith to resolve the  
 5 disputes without further judicial intervention as this Court has directed and in an effort to fully  
 6 comply with this Court's directive;

7 NOW, THEREFORE, the parties, by their respective undersigned counsel, and subject to  
 8 this Court's approval, agree and stipulate as follows:

9 1. The parties shall conclude their meet and confer efforts regarding the discovery  
 10 disputes raised in Defendant's motion for protective order (Dkt. No. 63) and Plaintiff's motion to  
 11 compel (Dkt. No. 88) by July 17, 2015;

12 2. If they are unable to resolve the disputes in their entirety, the parties may bring  
 13 renewed discovery motions no later than July 24, 2015. Any such motions will be briefed  
 14 according to the following schedule: response due no later than July 31, 2015, and reply due no  
 15 later than August 7, 2015.

16 DATED: July 7, 2015

17 **IT IS SO STIPULATED:**

18 SHOOK & STONE, CHTD.

GRANT & EISENHOFER P.A.

19 /s/ Leonard H. Stone  
 LEONARD H. STONE (NV Bar No. 5791)  
 20 MICHAEL P. O'ROURKE (NV Baar No. 6764)  
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 21 Las Vegas, NV 89101

/s/ Adam J. Levitt  
 ADAM J. LEVITT (admitted pro hac vice)  
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22 *Attorneys for Plaintiff*

*Attorneys for Plaintiff*

23 HOLLAND & HART LLP

24 /s/ Brian G. Anderson  
 PATRICK J. REILLY (NV Bar No. 6103)  
 25 BRIAN G. ANDERSON (NV Bar No. 10500)  
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 26 Las Vegas, NV 89134

27 *Attorneys for Defendant*

IT IS SO ORDERED.  
 DATED: July 8, 2015

  
 NANCY J. KOPPE  
 United States Magistrate Judge